

MANDELBAUM SALSBURG
MANDELBAUM, SALSBURG, GOLD, LAZARIS & DISCENZA, P.C.
ATTORNEYS AT LAW
FOUNDED IN 1930

155 PROSPECT AVENUE
WEST ORANGE, NJ 07092-4204
TEL. (973) 736-4600 • FAX (973) 325-7487

UNION COUNTY OFFICE
75 ELIZABETH AVENUE
ELIZABETH, NJ 07206
TEL. (908) 353-6764 • FAX (908) 353-6780

MIDDLESEX COUNTY OFFICE
317 GEORGE STREET, SUITE 140
NEW BRUNSWICK, NJ 08901
TEL. (732) 620-0900 • FAX (732) 620-0920

MONMOUTH COUNTY OFFICE
118 MAPLE AVENUE
RED BANK, NJ 07701
TEL. (732) 933-1515 • FAX (732) 933-5551

FLORIDA OFFICE
10304 CROSBY PLACE
PORT ST. LUCIE, FL 34986
TEL. (772) 460-6356 • FAX (772) 460-6357
E-Mail: rsteinberg_cao@yahoo.com

NEW YORK CITY OFFICE
90 JOHN STREET, SUITE 300
NEW YORK, NY 10038
TEL. (212) 761-7200 • FAX (212) 761-7270

Website: www.msgid.com
E-Mail: ynnble@magid.com

ALL REPLIES TO: WEST ORANGE
REFERENCE: HLL #

IRVING MANDELBAUM (1906-1993)
DARRY R. MANDELBAUM
RICHARD M. SALSBURG
AVROM J. GOLD
YALE I. LAZARIS
JOHN R. DUSINBERRE
JOSEPH J. DISCENZA
JOSEPH A. VENA
LYNN S. SIKOFF
OWEN T. HUGHES
CARY E. YOUNG
RICHARD L. SLAVITT
CHARLES S. LORBER
ARTHUR D. GROSSMAN
DEBORAH L. GREENE
ROBERT W. GLUCK
MICHAEL A. SAFFER
STEVEN A. HOLT
MARK F. KLUGER
WILLIAM H. HEALEY
CRAIG W. ALEXANDER
WILLIAM S. BARRETT
DENNIS J. ALESSI
STUART GOLD
CHERYL H. BURSTEIN
ROBIN F. LEWIS
JOSEPH J. PETERS
THOMAS W. ACKERMANN
SHARON T. JACOBSON
DAVID S. CARTON
PAUL T. GREGORY

ALAN L. SUSSMAN
LISA FACTOR FOX
RICKI ANNE SOKOL
RICHARD H. STEINBERG
MARK RAIMCARTEN
MICHAEL SCHLESINGER
JOSEPH T. MURRAY

MANUEL R. GROVA, JR.
DEBORAH A. CONCEPCION
ANDREA L. ALEXANDER
LANCE N. OLITT
PETER H. TANFILL
WHITNEY G. FISHER
LAUREN BETTMAN CERSHENCORN
CHRISTOPHER M. ERB
JUSTIN S. BLACK

• FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS
• CERTIFIED BY THE SUPREME COURT OF NEW JERSEY AS A CERTIFIED CIVIL TRIAL ATTORNEY
• CERTIFIED BY THE SUPREME COURT OF NEW JERSEY AS A CERTIFIED MATRIMONIAL TRIAL ATTORNEY
• COURT APPOINTED MEDIATOR
1. MEMBER OF NJ & PA BAR
2. MEMBER OF NJ & FL BAR
3. MEMBER OF NJ & NY BAR
4. MEMBER OF NJ & MA BAR
5. MEMBER OF NJ, NY & CA BAR
6. MEMBER OF NJ, NY & PA BAR
7. MEMBER OF NJ, NY & D.C. BAR
8. MEMBER OF NJ & ILL. BAR
9. MEMBER OF NY BAR

DEAN T. BENNETT
DAVID A. WAKID
HON. ROBERT A. LONGHI (RET.)
RICHARD L. SIMON
CHARLES E. DAXLEY
JAMES F. DAXLEY

ALONA MAGIDOVA
ARLA D. CAHILL
GARY S. POPLARKI
OWEN J. LIPNICK
PHILLIP G. RAY
YANFENG WU
SHARILA D. IAZZETTA
DOOYONG KANG
CASPER L. CARHART

June 2, 2008

Via Facsimile (212) 805-7901 & First Class Mail

Honorable Harold Baer, U.S.D.J.

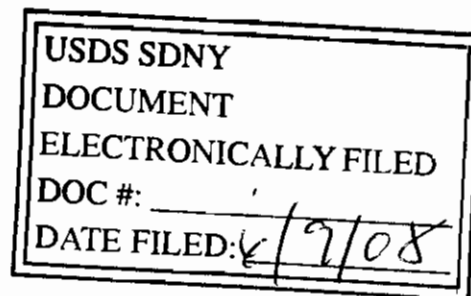
U.S. District Court for the Southern District of New York

Daniel Patrick Moynihan

U.S. Courthouse

500 Pearl Street, Room 2230

New York, New York 10007



Re: Evariste v. Securitas Security Services USA, Inc., et al.
Civil Action No: 07-7262 (HB)

Dear Judge Baer:

We represent Defendant Securitas Security Services USA, Inc. ("Securitas") in the above-referenced matter. As directed by your law clerk, Anna Gereas, we are writing to respectfully request an adjournment of the dispositive motion deadline set forth in the Court's May 22, 2008 Pretrial Scheduling Order. The Order states that no party may make a dispositive motion returnable after October 30, 2008. Although we had agreed to that date, we failed to realize how close in time that date is to the August 29, 2008 discovery end date, especially if the motion has to be fully briefed and made returnable before October 30th. Moreover, because the Plaintiff in this matter is *pro se*, he will likely require additional time to draft his opposition brief and compile his supporting documentation.

Accordingly, we hereby request a two-month adjournment of the October 30th dispositive motion deadline, or until December 31, 2008. Please note that the matter is not scheduled for trial until March 2009, and that there would be sufficient time between the filing of the dispositive motion and the trial.

We thank the Court for its time and attention to this matter.

286724

Honorable Harold Baer, U.S.D.J.
June 2, 2008
Page 2

Respectfully submitted,

Yanet Perez Noble
YANET PEREZ NOBLE

cc: Kapiamba Evariste, *pro se* Plaintiff (via first class mail)

*sounds fair to me
lets make return date
Dec 15, 08 so we dont
get within request because of
the holidays I need month
before March 09 time
more time than you take
pro se*

SO ORDERED:

Harold Baer, Jr.
Harold Baer, Jr., U.S.D.J.

Date: *6/9/08*

Endorsement:

Sounds fair to me let's make return date December 15, 2008 so we don't get another request because of the holidays. Trial month remains March 2009. Give pro se more time than you take.